

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re
Alexander E. Jones,
Debtor,

Bankruptcy
Case No. 22-33553 (CML)

Chapter 7

David Wheeler, Francine Wheeler,
Jacqueline Barden, Mark Barden, Nicole
Hockley, Ian Hockley, Jennifer Hensel,
Donna Soto, Carlee Soto Parisi, Carlos M.
Soto, Jillian Soto-Marino, William
Aldenberg, William Sherlach, Robert Parker,
and Erica Ash,

Adv. Pro. No.: 23-03037 (CML)

Plaintiffs,

v.

Alexander E. Jones and Free Speech
Systems, LLC,
Defendants.

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY
TO DEFENDANT ALEXANDER E. JONES'S RESPONSE TO PLAINTIFFS' MOTION
FOR PARTIAL RECONSIDERATION**

The Connecticut Families¹ ("Plaintiffs") respectfully move for an order extending their time to reply to Defendant Alexander E. Jones's Response to Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Partial Reconsideration of the October 19, 2023 Order on Plaintiffs' Motion for Summary Judgment until November 11, 2024, which is seven (7) days from

¹ The Connecticut Families include David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, Robert Parker, and Erica Ash.

the current deadline of November 4, 2024. In support of this unopposed Motion, Plaintiffs state as follows:

1. On September 16, 2024, Plaintiffs filed a Motion for Partial Reconsideration of this Court's October 19, 2023 Order on Plaintiffs Motion for Summary Judgment (*See* Doc. 98).

2. On October 28, 2024, Defendant filed his response to Plaintiffs' Motion, *see* Doc. 107, pursuant to an order granting Defendant's unopposed request for additional time to respond to the motion, *see* Doc. 105.

3. Plaintiffs' reply is currently due on November 4, 2024. *See* District Court Local Rule 7.4(e).

4. Plaintiffs request a one-week extension, until November 11, 2024, to allow sufficient time to respond.

5. Counsel for Plaintiffs has conferred with counsel for Defendant and Defendant does not object to the granting of this extension.

6. Plaintiffs have not previously filed a motion for an extension of time to file a reply to Defendant's response to Plaintiffs' Motion to Reconsider.

7. This request is made in good faith and not for the purpose of delay.

WHEREFORE, Plaintiffs respectfully request this Court enter an order extending Plaintiffs' time to reply to Defendant's Response to Plaintiffs' Motion for Partial Reconsideration from November 4, 2024 to November 11, 2024.

Dated: New York, New York
October 31, 2024

CAIN & SKARNULIS PLLC

By: /s/ Ryan E. Chapple

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was filed and served on all persons entitled to receive notice via operation of this Court's CM/ECF system on October 31, 2024.

/s/ Ryan E. Chapple

Ryan E. Chapple